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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ZAKKARY C. EREVIA,)
Plaintiff,) Case No.: 2:20-cv-01153-VCF
)
v.)
ANDREW SAUL,)
Commissioner of Social Security,)
Defendant.)

)

Defendant Andrew Saul, Commissioner of Social Security (“Defendant”) respectfully requests
that the Court extend the time for Defendant to respond to Plaintiff’s Motion for Reversal and/or
Remand (Motion) from June 11, 2021 to July 11, 2021. This is Defendant’s first request for extension
to respond to Plaintiff’s Motion and third request in this case. Defendant respectfully requests this
additional time because counsel is currently in the process of determining if a settlement agreement is
possible. If the case cannot be settled, then Defendant’s counsel will draft the responsive brief.

1 Counsel contacted Plaintiff on June 9, 2021 and Plaintiff does not object to this request.

2 This request is made in good faith with no intention to unduly delay the proceedings.

3 Counsel apologizes to the Court for any inconvenience caused by this delay.

4 Respectfully submitted this June 9, 2021.

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6 CHRISTOPHER CHIOU
7 Acting United States Attorney

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9 */s/ Chantal R. Jenkins*
10 CHANTAL R. JENKINS
11 Special Assistant United States Attorney

12 OF COUNSEL:

13 DEBORAL LEE STACHEL
14 Regional Chief Counsel, Region IX

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16
17 IT IS SO ORDERED:
18 
19 UNITED STATES MAGISTRATE JUDGE

20 June 10, 2021

21 DATED: _____

CERTIFICATE OF SERVICE

I, Chantal R. Jenkins, certify that the following individual was served with a copy of the
MOTION FOR EXTENSION OF TIME on the date and via the method of service identified below:

Cyrus Safa
Law Offices of Lawrence D. Rohlfing
12631 E. Imperial Highway, Suite C-115
Santa Fe Springs, CA 90670
562-868-5886
Fax: 562-868-5491
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Leonard Stone
710 S Fourth Street
Las Vegas, NV 89101
702-385-2220

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 9, 2021

/s/ Chantal R. Jenkins
CHANTAL R. JENKINS
Special Assistant United States Attorney